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July 5, 2023

-Via ECF-

~~Honorable Stewart D. Aaron  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, NY 10007~~

~~JENNIFER E. WILLIS  
United States Magistrate Judge  
Southern District of New York~~

*Request granted*  
*MR*  
*Robert W. Tsigler*  
*SDNY*  
*7/10/2023*

**RE: 2nd Request for Modification of Bond Conditions**  
*U.S. v. Nirvana Sabess*  
Case No.: 1:23-mj-03400-UA-1

Dear Judge Aaron:

Our office represents Ms. Nirvana Sabess in the above-referenced matter. We respectfully request a modification of her current bond conditions to permit Ms. Sabess to travel from Philadelphia, Pennsylvania to Minneapolis, Minnesota on Tuesday, July 10, 2023 through Saturday, July 15, 2023, in order to attend an employer-sponsored staff retreat and training seminar. We have conferred with the Government and SDNY Pretrial Services Office (“USPSO”); the latter does not object and the Government defers to USPSO concerning the instant request.

### **Background**

Under the referenced Complaint, Ms. Sabess is charged with having committed the offenses of Wire Fraud and Aggravated Identity Theft, in violation of Title 18, U.S.C. §§ 1343 and 1028A(a)(1), 1028A(b), respectively. Following her arrest, she was released on a \$75K personal recognizance bond (“PRB”) co-signed by two financially responsible persons (“FRPs”), with travel restrictions limited to SDNY, EDNY and the District of New Jersey, where she resides. Ms. Sabess has been fully compliant to date.

An additional condition of bond required that Ms. Sabess actively seek employment, which she has succeeded in obtaining. Presently she works as the director of human resources for OPPORTUNITIES INDUSTRIALIZATION CENTERS of AMERICA, INC. (“OICA”),

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located in Philadelphia, PA. OICA has arranged for members of Ms. Sabess' HR team to attend an employee retreat and training seminar in Minneapolis, Minnesota. Ms. Sabess has been scheduled to arrive at the retreat on Tuesday, July 11, 2023 and depart late Friday, July 14, 2023. Copies of the airline travel arrangements made by OICA and the retreat agenda are attached separately as exhibits. Ms. Sabess is expected to attend as a function of her position with the company and director of her team.

Accordingly, we respectfully request that the Court grant Ms. Sabess' conditions of release on bond be modified to permit work-related travel from Philadelphia, PA on Tuesday, July 11, 2023, beginning at 12:00 p.m., to Minneapolis, Minnesota through Saturday, July 15, 2023, at 6:00 a.m. in order to attend an employee retreat and training seminar. It is understood that Ms. Sabess will notify her pretrial services officer(s) upon her return.

Thank you for your attention and consideration to this matter.

Respectfully Submitted,

/s/ Scott Migden  
SCOTT MIGDEN, ESQ.  
LAW OFFICES OF ROBERT TSIGLER  
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